

APR 04 1990

Mr. Larry Prouty
Ashland Chemical Co.
3155 Fiberglass Road
Kansas City, Kansas 66115

Dear Mr. Prouty:

RE: Visual Site Inspection of Ashland Chemical Co.
3155 Fiberglass Road, Kansas City, Kansas
EPA ID No. KSD000203638

As a follow-up to discussions between yourself and Mark Matthews of the Environmental Protection Agency (EPA) Region VII, this letter is to confirm that a Visual Site Inspection (VSI) is to be conducted of the above referenced facility by representatives from our contractor, Ecology and Environment, Inc. (E&E). The VSI has been scheduled for April 27, 1990, beginning at 9:30 a.m. Your cooperation in admitting and assisting the contractor representatives while on site is appreciated. The contractor representatives, Patty Roberts and Otavio Silva, will be accompanied by Mark Matthews of EPA, and Paul Cahoon of the Kansas Department of Health and Environment (KDHE).

The Hazardous and Solid Waste Amendments of 1984 (HSWA) to the Resource Conservation and Recovery Act (RCRA) "require corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage, or disposal facility seeking a permit under this subtitle regardless of the time at which waste was placed in the unit" (42 U.S.C. 6924(u)). The RCRA Facility Assessment (RFA) is the EPA's program for identifying those solid waste management units (SWMUs) which have releases that require corrective action. The RFA is authorized under Section 3007 of RCRA.

An integral portion of the RFA is the VSI of your facility to verify and determine the location of all SWMUs and other areas of concern. We are requiring that our contractor visit your

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facility to conduct the VSI. During the VSI no samples will be taken. The EPA contract personnel will require the assistance of some of your personnel in reviewing solid waste flow, previous waste management practices, conducting a tour of the waste management practices and facility processes, and to assist with any questions. This site visit is to provide us with a technical understanding of the waste flows present and past. Photographs of each SWMU are to be taken to document conditions of the facility and procedures used. Upon completion of the VSI the contractors will evaluate their findings and may return to your facility to collect additional data including samples.

E&E is conducting a review of information on the facility at EPA Region VII. A list of potential SWMUs to be viewed during the VSI and a description of Ms. Roberts and Mr. Silva, will be sent to you as soon as they are available.

If you have any questions please contact Mark Matthews at (913) 236-2888.

Sincerely yours,

Lyndell L. Harrington, P.E.
Chief, Permits Section
RCRA Branch
Waste Management Division

cc: Mr. Paul Cahoon, KDHE
Ms. Patty Roberts, E&E



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

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